

SWIDLER BERLIN LLP
The Washington Harbour
3000 K Street, N.W., Suite 300
Washington, DC 20007
Telephone: (202) 424-7500
Facsimile: (202) 424-7645
Jonathan P. Guy (Bar No. JG 2634)
Roger Frankel
Matthew W. Cheney
Attorneys for Sanders Lead Co., Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
	:	
DELPHI CORPORATION, <u>et al.</u>,	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	

NOTICE OF RECLAMATION DEMAND

PLEASE TAKE NOTICE that pursuant to 11 U.S.C. § 546(c) and Section 2-702 of the Uniform Commercial Code, and in accordance with the Reclamation Order [Doc. No. 230] signed on October 13, 2005, the reclamation demand attached hereto as Exhibit A was served on behalf of Sanders Lead Co., Inc. on the Debtors and their counsel on October 18, 2005.

SWIDLER BERLIN LLP

Dated: October 18, 2005
Washington, DC

By: /S/ Jonathan P. Guy
Jonathan P. Guy (JG 2634)
Roger Frankel
Matthew W. Cheney
The Washington Harbour
3000 K Street, N.W., Suite 300
Washington, DC 20007
Telephone: (202) 424-7500
Facsimile: (202) 424-7645

Attorneys for Sanders Lead Co., Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of October, 2005, I caused a true and correct copy of the foregoing Notice of Reclamation Demand to be served via first class mail, postage prepaid, on the following:

John William Butler, Jr., Esquire
John K. Lyons, Esquire
Ron E. Meisler, Esquire
Allison Verderber Herriott, Esquire
Skadden, Arps, Slate, Meagher & Flom LLP
333 West Wacker Drive, Suite 2100
Chicago, IL 60606
Counsel to the Debtors

Kayalyn A. Marafioti, Esquire
Thomas J. Matz, Esquire
Skadden, Arps, Slate, Meagher & Flom LLP
Four Times Square
New York, NY 10036
Counsel to the Debtors

Alicia M. Leonhard, Esquire
Office of the United States Trustee
33 Whitehall Street, Suite 2100
New York, NY 10004

/S/ Debra O. Fullem
Debra O. Fullem, Senior Legal Assistant
Swidler Berlin LLP

EXHIBIT A

RECLAMATION DEMAND OF SANDERS LEAD CO., INC.

SWIDLER BERLIN LLP

Matthew W. Cheney
Phone 202.295.8432
Fax 202.424.7643
mwcheney@swidlaw.com

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3000 K Street, N.W., Suite 300
Washington, D.C. 20007-5116
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BY FACSIMILE AND FEDERAL EXPRESS

October 18, 2005

Robert S. Miller, Jr., Chairman and CEO
Delphi Corporation and Its Affiliates
North American Headquarters
5725 Delphi Drive
Troy, MI 48098-2815
Ph: 248-813-2000
Fax: 248-813-2670

John D. Sheehan, Vice President
Delphi Automotive Systems
5725 Delphi Drive
Troy, MI 48098-2815
Ph: 248-813-2000
Fax: 248-813-2670

Re: *Notice of Demand for Reclamation*
In re Delphi Corp., et al., Case No. 05-44481

Dear Sirs:

We represent Sanders Lead Co., Inc. ("Sanders") with respect to shipments of goods, specifically refined lead alloy, to Delphi Corporation and its debtor-affiliates and subsidiaries in the above-captioned jointly administered bankruptcy proceedings, including, without limitation, Delphi Automotive Systems (collectively, "Delphi"), at Fitzgerald, Georgia, for the period of September 28, 2005 through October 7, 2005.

Pursuant to 11 U.S.C. § 546(c) and Section 2-702 of the Uniform Commercial Code, as applicable in each jurisdiction, and in accordance with the Reclamation Order [Doc. No. 230] signed on October 13, 2005 by the Bankruptcy Court, Sanders makes formal demand on Delphi for the return of goods supplied by Sanders to Delphi for which proper payment has not been made to Sanders by Delphi. The goods that Sanders demands that Delphi return are identified on the attached schedule and invoices.

Please assemble these goods at the Fitzgerald plant and Sanders will reclaim the goods at that location. Please contact Roy Bray at 334-566-1563 to arrange for the immediate return of the goods. In the interim, please inventory and segregate the goods and provide us with written confirmation that the goods are on your premises.

Sanders expressly reserves all of its rights, powers, remedies, claims and defenses now or hereafter existing at law, in equity or by statute. The exercise or non-exercise of any such right, power, remedy, claim or defense is not a waiver of the right to exercise, and will not preclude the

SWIDLER BERLIN^{LLP}

Robert S. Miller, Jr.

John D. Sheehan

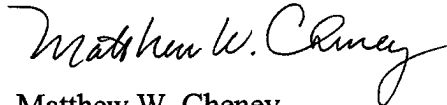
October 18, 2005

Page 2

simultaneous or later exercise by Sanders of, any or all such rights, powers, remedies, claims or defenses.

I appreciate your cooperation. If there are any questions, do not hesitate to contact me.

Very truly yours,



Matthew W. Cheney

Enclosures

cc: **Via Facsimile and Federal Express with enclosures:**

John Wm. Butler, Jr., Esquire

John K. Lyons, Esquire

Allison Verderber Herriott, Esquire

Skadden, Arps, Slate, Meagher and Flom LLP

Suite 2100

333 West Wacker Drive

Chicago, IL 60606

Ph: 312-407-0700

Fax: 312-407-0411

Roger Frankel, Esquire

N. Kenneth Campbell (via facsimile)

Roy Bray (via facsimile)

Shipments for 10 days prior to Oct. 8, 2005

BEFI	DELPHI ENERGY	FITZGERALD	GA	0779650	9/28/05	46,595	\$ 7,627.60	\$ 11,439.07	9595	ANTIMONIAL LEAD	53780	FS98-002	0751897
BEFI	DELPHI ENERGY	FITZGERALD	GA	0780166	9/29/05	45,405	\$ 7,432.80	\$ 11,146.93	9595	ANTIMONIAL LEAD	53523	FS98-002	0752328
BEFI	DELPHI ENERGY	FITZGERALD	GA	0780864	10/2/05	51,140	\$ 8,371.62	\$ 12,554.87	9595	ANTIMONIAL LEAD	53500	FS98-002	0752833
BEFI	DELPHI ENERGY	FITZGERALD	GA	0781181	10/3/05	45,505	\$ 7,449.17	\$ 11,171.48	9595	ANTIMONIAL LEAD	53587	FS98-002	0753338
BEFI	DELPHI ENERGY	FITZGERALD	GA	0781724	10/4/05	44,760	\$ 7,327.21	\$ 10,988.58	9595	ANTIMONIAL LEAD	53584	FS98-002	0753758
BEFI	DELPHI ENERGY	FITZGERALD	GA	0782265	10/5/05	41,215	\$ 6,746.90	\$ 10,118.28	9595	ANTIMONIAL LEAD	53549	FS98-002	0754167
BEFI	DELPHI ENERGY	FITZGERALD	GA	0782734	10/6/05	45,710	\$ 7,482.73	\$ 11,221.81	9595	ANTIMONIAL LEAD	53523	FS98-002	0754691
				228,330			\$ 37,377.62	\$ 78,641.02					



P.O. DRAWER 707
TROY, ALABAMA 36081-0707
334-566-1563

INVOICE# 0754167-1

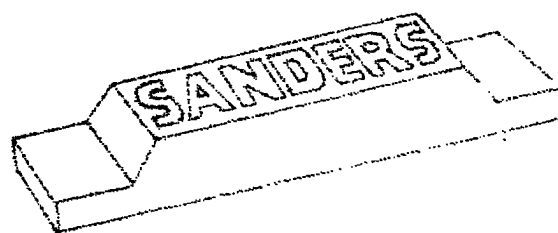
DATE 10/05/05

SOLD
TO

DEFI
DELPHI ENERGY
342 PERRY HOUSE RD
FITZGERALD GA 31750

Scale Ticket# 48924

SHIPPED
TO
DELPHI ENERGY
342 PERRY HOUSE RD
FITZGERALD GA 31750

PURCHASE ORDER NO.		TYPE	TERMS	TRUCK NO.	PPD OR CC	
FS98-002		HSS	CONVERS	53549	PPD	
QUANTITY	DESCRIPTION			UNIT PRICE	AMOUNT	
41,215 4,265	9595 ANTIMONIAL LEAD TARE 20 BUNDLES LOT 433-9595; 700 PIGS 17 EMPTY CONTAINERS 18743			.1637	6746.90	
<div></div> <div>RECEIVED BY _____ DATE _____</div> <div>Please Remit To: SANDERS LEAD CO., INC. P.O. DRAWER 707 TROY, ALABAMA 36081-0707</div>						
REMITTANCE ADVISED				TOTAL INVOICE	\$6,746.90	



P.O. DRAWER 707
TROY, ALABAMA 36081-0707
334-566-1563

INVOICE# 0753758-1

DATE 10/04/05

SOLD
TO

DEFI
DELPHI ENERGY
342 PERRY HOUSE RD
FITZGERALD GA 31750

Scale Ticket# 48868

SHIPPED
TO
DELPHI ENERGY
342 PERRY HOUSE RD
FITZGERALD GA 31750

PURCHASE ORDER NO.	TYPE	TERMS	TRUCK NO.	PPD or CC
FS98-002	HSS	CONVERS	53584	PPD

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
44,760	9595 ANTIMONIAL LEAD 22 BUNDLES LOT 433-9595; 770 PIGS 18733	.1637	7327.21

RECEIVED BY _____
DATE _____

Please Remit To:
SANDERS LEAD CO., INC.
P.O. DRAWER 707
TROY, ALABAMA 36081-0707

REMITTANCE ADVISE@	TOTAL INVOICE	\$7,327.21
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P.O. DRAWER 707
TROY, ALABAMA 36081-0707
334-566-1563

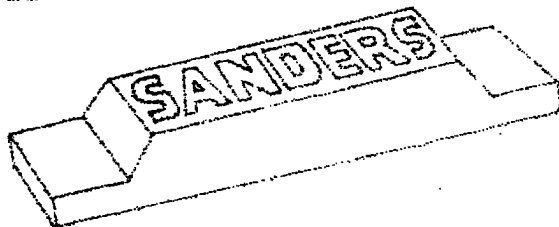
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DATE 10/03/05

SOLD
TODEFI
DELPHI ENERGY
342 PERRY HOUSE RD
FITZGERALD GA 31750

Scale Ticket# 48800

SHIPPED
TO
DELPHI ENERGY
342 PERRY HOUSE RD
FITZGERALD GA 31750

PURCHASE ORDER NO.	TYPE	TERMS	TRUCK NO.	PPD OR CC
FS98-002	HSS	CONVERS	53587	PPD
QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT	
45,505 1,455	9595 ANTIMONIAL LEAD TARE 9 BUNDLES LOT 412-9595 13 BUNDLES LOT 433-9595 22 BUNDLES TOTAL; 769 PIGS 18716 	.1637	7449.17	
RECEIVED BY _____ DATE _____		<div>Please Remit To: SANDERS LEAD CO., INC. P.O. DRAWER 707 TROY, ALABAMA 36081-0707</div>		

REMITTANCE ADVISE

TOTAL INVOICE

\$7,449.17



P.O. DRAWER 707
TROY, ALABAMA 36081-0707
334-566-1563

INVOICE# 0752833-1

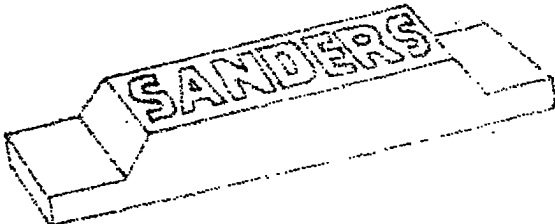
DATE 10/02/05

SOLD
TO

DEFI
DELPHI ENERGY
342 PERRY HOUSE RD
FITZGERALD GA 31750

Scale Ticket# 48769

SHIPPED
TO
DELPHI ENERGY
342 PERRY HOUSE RD
FITZGERALD GA 31750

PURCHASE ORDER NO.		TYPE	TERMS	TRUCK NO.	PPD OR CC	
FS98-002		HSS	CONVERS	53500	PPD	
QUANTITY	DESCRIPTION			UNIT PRICE	AMOUNT	
51,140	9595 ANTIMONIAL LEAD 25 BUNDLES LOT 412-9595; 875 PIGS 18701			.1637	8371.62	
<div></div>						
RECEIVED BY _____				<div>Please Remit To: SANDERS LEAD CO., INC. P.O. DRAWER 707 TROY, ALABAMA 36081-0707</div>		
DATE _____						
TOTAL INVOICE				\$8,371.62		

REMITTANCE ADVISE



P.O. DRAWER 707
TROY, ALABAMA 36081-0707
334-566-1563

INVOICE# 0752320-1

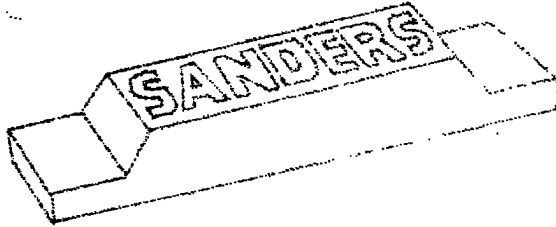
DATE 9/29/05

SOLD
TO

DEFI
DELPHI ENERGY
342 PERRY HOUSE RD
FITZGERALD GA 31750

Scale Ticket# 40689

SHIPPED
TO
DELPHI ENERGY
342 PERRY HOUSE RD
FITZGERALD GA 31750

PURCHASE ORDER NO.	TYPE	TERMS	TRUCK NO.	PPD OR CC
FS98-002	HSS	CONVERS	53523	PPD
QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT	
45,405 935	9595 ANTIMONIAL LEAD TARE 23 BUNDLES LOT 412-9595; 805 PIGS 8 EMPTY CONTAINERS 10600	.1637	7432.80	
				
RECEIVED BY _____ DATE _____				
Please Remit To: SANDERS LEAD CO., INC. P.O. DRAWER 707 TROY, ALABAMA 36081-0707				

REMITTANCE ADVISE

TOTAL INVOICE

\$7,432.80



P.O. DRAWER 707
TROY, ALABAMA 36081-0707
334-566-1563

INVOICE# 0751097-1


DATE 9/28/05

SOLD
TO

DEFI
DELPHI ENERGY
342 PERRY HOUSE RD
FITZGERALD GA 31750

Scale Ticket# 48606

SHIPPED
TO
DELPHI ENERGY
342 PERRY HOUSE RD
FITZGERALD GA 31750

PURCHASE ORDER NO.	TYPE	TERMS	TRUCK NO.	PPD OR CC
FS98-002	HSS	CONVERS	53780	PPD
QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT	
46,595 1,185	9595 ANTIMONIAL LEAD TARE 23 BUNDLES LOT 412-9595; 805 PIGS 10 EMPTY CONTAINERS 18674	.1637	7627.60	
				
RECEIVED BY _____ DATE _____				
REMITTANCE ADVISE				TOTAL INVOICE \$7,627.60

Please Remit To:
SANDERS LEAD CO., INC.
P.O. DRAWER 707
TROY, ALABAMA 36081-0707



P.O. DRAWER 707
TROY, ALABAMA 36081-0707
334-566-1563

INVOICE# 0754691-1

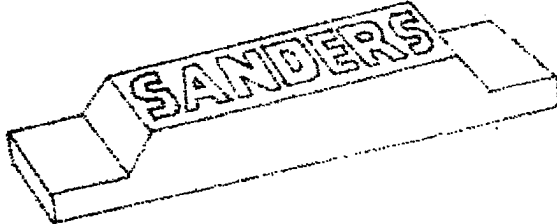
DATE 10/06/05

SOLD
TO

DEFI
DELPHI ENERGY
342 PERRY HOUSE RD
FITZGERALD GA 31750

Scale Ticket# 48982

SHIPPED
TO
DELPHI ENERGY
342 PERRY HOUSE RD
FITZGERALD GA 31750

PURCHASE ORDER NO.	TYPE	TERMS	TRUCK NO.	PPD OR CO
FS98-002	HSS	CONVERS	53523	PPD
QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT	
45,710 1,430	9595 ANTIMONIAL LEAD TARE 22 BUNDLES LOT 433-9595; 770 PIGS 12 EMPTY CONTAINERS 18756	.1637	7482.73	
				
RECEIVED BY _____ DATE _____				
TOTAL INVOICE				\$7,482.73

REMITTANCE ADVISE

Please Remit To:
SANDERS LEAD CO., INC.
P.O. DRAWER 707
TROY, ALABAMA 36081-0707